



STATE OF IOWA

CHESTER J. CULVER, GOVERNOR
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DEPARTMENT OF NATURAL RESOURCES
RICHARD A. LEOPOLD, DIRECTOR

December 17, 2008

«FirstName» «LastName»
«Title»
«FacilityName»
«MailingAddress»
«MailingAddress2»
«City», «State» «Zip»

Re: REMINDER –Air Emission Inventory and other Title V Reporting Requirements
EIQ #: «EIQ_No», Facility #: «Facility_No»

Dear «Greeting» «LastName»:

This is to remind you of emission inventory and several other reporting requirements due for facilities subject to Title V of the Clean Air Act. Please note that your facility may have additional reporting requirements not listed below.

Title V Report	Due Date
Emissions Inventory	March 31, 2009
Fee Payment	July 1, 2009
Annual Compliance Certification	*March 31, 2009
Semi-Annual Monitoring Report	*March 31, 2009 & **September 30, 2009

* Required only if your initial Title V permit was issued prior to January 1, 2009.

** Required only if your initial Title V permit was issued prior to July 1, 2009.

As required for the 2007 emission year, you must continue to report the emissions of PM_{2.5} and ammonia on your 2008 and future emission inventories. Please read the attached "Title V Emissions Inventory FAQ" for more detailed information.

As required for the 2007 emission year, you must continue to report 2008 greenhouse gas (GHG) emissions on the separate spreadsheet(s) designed by the DNR. Do not include GHG emissions on Form 4.0 or Form 5.0. No fees are required for GHG emissions. Please see the attached "Additional Greenhouse Gas Reporting Requirements for 2008" for detailed information on how to submit GHG inventories.

If you have questions regarding the Emissions Inventory or Fee Payment reports, please call Chris Kjellmark at (515) 281-7826 or Weston Li at (515) 281-8549. Please call Marnie Stein at (515) 281-8468 if you have any questions about greenhouse gas inventories. Please call Dennis Thielen at (515) 281-4899 if you have any questions about the Annual Compliance Certification or Semi-Annual Monitoring Report.

Sincerely,

Douglas A. Campbell
Supervisor, Air Operating Permits Section

Enclosures: Title V Emissions Inventory FAQ
Additional Greenhouse Gas Reporting Requirements for 2008
Title V Emission Inventory & SPARS Training Announcement

Title V Emissions Inventory FAQ

When is the emissions inventory due?

It must be post-marked by March 31.

What forms are required?

Forms 1.0, 4.0, 5.0, and Part 3.

Note: only the bottom section of Part 3 needs to be signed - "Certification of Truth, Accuracy and Completeness"

Where can I get the forms and instructions?

The forms can be downloaded from the Air Quality Bureau's web page (www.iowacleanair.com). First click on the 'Operating Permits' link on the left side of the page. Then click on 'Title V/CAIR Applications, Emissions Inventory/Fee Payment - Forms & Instructions.' To request a paper copy call (515) 281-7826.

How many copies should be submitted?

Two, unless your facility is located in Linn or Polk County.

Three copies are required if your facility is located in Linn or Polk County.

Where do I send the emissions inventory?

Attention: Douglas A. Campbell
Iowa DNR, Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Can I submit electronically?

Yes. You may use the web version of the State Permitting and Reporting System (SPARS) software to submit your emissions inventory electronically.

Please note that if you submit your inventory using SPARS Web, you do not need to mail a hard copy to DNR. This includes facilities located in Linn or Polk County.

If you wish to submit your emissions inventory electronically, but do not have access to SPARS Web, please contact Rachel Quill at 515-281-8983 or rachel.quill@dnr.iowa.gov. For more information about SPARS Web, visit our web page (www.iowacleanair.com) and click on the 'SPARS' link.

When is the fee payment due? Will I be notified of the fee rate?

It must be post-marked by July 1. The Title V fee rate will be set in May by the Environmental Protection Commission. Your company will be notified in writing after the fee rate is set. The fee rate notification will also be posted on our web page (www.iowacleanair.com).

Have any of the inventory forms changed since last year?

No changes to Forms 4.0 and 5.0. However, you should use the spreadsheet(s) designed by DNR to report greenhouse gas (GHG) emissions as instructed in the enclosed "Additional Greenhouse Gas Reporting Requirements for 2008." Do not report GHG emissions on Form 4.0 or Form 5.0.

How should actual emissions be calculated?

Emission estimations should be based on continuous emission monitoring data, stack test data, mass balance, or EPA approved emission factors. If none of these methods are available, an emission factor from a similar source can be substituted, considering the characteristics of the material being processed or handled are similar.

Can I include just a total of all the HAPs emitted on Forms 4.0 and 5.0, instead of reporting them separately?

No. HAP emissions need to be listed separately on Forms 4.0 and 5.0, along with the appropriate CAS number.

Is there a de minimus level for reporting emissions?

Yes. Emission totals reported on Form 4.0 only need to be reported to the nearest hundredth of a ton (##.## tons/yr). Emission totals greater than or equal to 0.005 tons/yr should be rounded up to the nearest hundredth of a ton, and reported on Form 4.0. Emission totals less than 0.005 tons/yr do not need to be reported.

Do I need to calculate emissions and pay fees for emissions from insignificant activities?

No. According to subrule 567 IAC 22.106(7), fees are not required for insignificant activities.

How do I avoid double-counting HAP emissions?

Most hazardous air pollutants (HAPs) are also considered VOCs (VOC HAP) or particulate matter (PM HAP). For a listing of these, please visit the technical guidance portion of the Operating Permits section's web page. You are required to report the totals for each HAP emitted on Forms 4.0 and 5.0. However, you are not required to pay fees twice for the same emissions.

If a HAP you reported on page 2 of Form 5.0 is also included in the VOC or PM₁₀ total reported on page 1 of Form 5.0, DO NOT include the value in the Emissions Subject to Fees column. Enter "0.00" instead.

If I do not need to pay fees on PM_{2.5}, total particulate matter, carbon monoxide, or ammonia emissions, then why do I need to report them on Forms 4.0 and 5.0?

Although they are considered regulated pollutants, you are not required to pay fees on PM_{2.5}, total particulate matter (PM), and carbon monoxide (CO) emissions. However, you are still required to report PM_{2.5}, PM, and CO emissions on Forms 4.0 and 5.0 because many sources have applicable requirements for these pollutants. The DNR also uses the totals for planning and inventory purposes and that is the sole purpose for requiring ammonia inventories at this time. Please note that fees are required for PM₁₀ emissions. Please also note that no fees are required for greenhouse gas (GHG) emissions and DO NOT include GHG emissions on Form 4.0 and Form 5.0.

Title V Emissions Inventory FAQ (Continued)

PM_{2.5} and Ammonia Emissions Reporting

◆ Do I need to report PM_{2.5} and ammonia emissions?

Yes. As required for the 2007 emission year, you must continue to report PM_{2.5} and ammonia emissions on your 2008 emissions inventories.

The EPA's Consolidated Emission Reporting Rule requires the DNR to report PM_{2.5} and ammonia emissions as part of the National Emissions Inventory.

◆ What forms do I use to report PM_{2.5} and ammonia emissions?

Title V operating permit application Forms 4.0 and 5.0 and instructions have been modified to include spaces for you to report PM_{2.5} and ammonia emissions. Please download the current inventory forms and instructions from Air Quality Bureau's website <http://www.iowacleanair.com/>. Please note that CAS number for ammonia is 7664-41-7.

If you report emissions using SPARS, follow the SPARS instructions.

◆ Where can I get the emission factors for PM_{2.5} and ammonia emissions?

You may obtain PM_{2.5} and ammonia emission factors from EPA's WebFIRE. It is available at <http://www.epa.gov/ttn/chief/efpac/index.html>.

Please contact us for additional sources of emission factors.

◆ Do Title V facilities have to pay fees on PM_{2.5} and Ammonia emissions?

No. The PM_{2.5} emissions are a subset of PM₁₀ emissions, which the Title V facilities already pay fees on. Ammonia does not meet the definition of "regulated air pollutant" for Title V fee purposes.

Additional FAQ

◆ WebFIRE (Factor Information Retrieval System)

WebFIRE is the EPA's internet version of FIRE. The FIRE application web site provides complete access to EPA's air emission factor information, and will allow for more frequent updates. WebFIRE replaced the software application, FIRE version 6.25, and the MS Access version of the database. (<http://www.epa.gov/ttn/chief/>)

◆ MEK is NOT a HAP

Methyl ethyl ketone (MEK, 2-Butanone, CAS# 78-93-3) has been removed from the list of hazardous air pollutants (HAP). Therefore, you should not report MEK as a HAP in the inventories; however, it should be included in your volatile organic compounds (VOC) total because it is still considered a VOC.

◆ T-Butyl Acetate is NOT a VOC

T-butyl acetate (tertiary butyl acetate, TBAC, CAS# 540-88-5) is no longer considered a VOC for purposes of VOC emissions limitations or VOC content requirements. Therefore, you should not include its emissions in your VOC emissions.

However, 40 CFR 51.100(s)(5) requires you uniquely identify its emissions in inventories. Thus, you should report the emissions of t-butyl acetate on Forms 4.0 (page 2) and 5.0 (page 2), but they are not subject to fees.

◆ Filterable vs. Condensable vs. Primary Particulate Matter (PM)

Primary (sum of filterable and condensable) PM_{2.5}, PM₁₀, and PM emissions should be reported on Forms 4.0 and 5.0. DNR recognizes that some emission units may be subject to filterable PM emission limits from federal regulations. The compliance demonstration method will remain the same in these instances. However for emissions inventory purposes, DNR reports primary PM_{2.5}, PM₁₀, and PM emissions to the EPA to meet the National Emissions Inventory obligations.

◆ What compounds are included in the glycol ethers category?

Glycol ethers are hazardous air pollutants as defined in IAC rule 22.100. Thousands of compounds are included in the glycol ethers category. The DNR suggests referring to the EPA document entitled "Toxics Release Inventory: List of Toxic Chemicals within the Glycol Ethers Category" for a list of compounds that are considered glycol ethers. This document is available at <http://www.epa.gov/ttn/atw/glycol2000.pdf>. Please note that ethylene glycol mono-butyl ether (CAS #111-76-2, also known as EGBE or 2-Butoxyethanol) was delisted from the HAP list and you should not report it as a HAP.

◆ Will DNR send another reminder as the deadline gets closer?

Yes, as the March 31 deadline approaches, the DNR will send a reminder on the Air Quality Bureau's listserver. Directions for subscribing to the listserver are as follows:

HOW TO SUBSCRIBE:

DNR's listserver is targeted to the regulated public and consultants to deliver timely regulatory news, program updates, and technical guidance to your email. To subscribe, send a blank E-mail to: join-iairtech@lists.ia.gov. The subject line should be left blank. If you have questions, comments or ideas for the listserver topics, please contact DNR's Mindy Kralicek at 515-281-7832 or mindy.kralicek@dnr.iowa.gov.



Attention!

Additional Greenhouse Gas Reporting Requirements for 2008

WHY?

Iowa Code 455B.152 requires the DNR to establish a method for collecting data from Iowa's producers of greenhouse gas emissions (GHGs). The methods for collecting the data will be phased in over several years by producer sectors and geographic areas.

In 2008 the DNR required reporting of direct GHG emissions from fossil fuel combustion and ethanol fermentation that occurred in 2007. Reporting of these emissions will also be required for 2008 emissions.

In addition, facilities will be required to report their 2008 emissions of hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). Facilities in six additional industrial sectors will also be required to report GHG emissions from their specific industrial processes.

WHAT?

By March 31, 2009, **all** facilities subject to the Title V Air Operating Permit Program are required to complete and submit the following GHG inventory document:

- Title V Greenhouse Gas Reporting Spreadsheet (*includes GHG emissions from Fossil Fuel Combustion, HFC emissions, PFC emissions, and SF₆ emissions*)

In addition, facilities that fall into these seven categories will be required to complete an industry-specific spreadsheet:

1. Ethanol Production
2. Cement Manufacturing (SIC 3241)
3. Lime Manufacturing (SIC 3274)
4. Ammonia Production and Urea Application (SIC 2873)
5. Nitric Acid Production (SIC 2873)
6. Iron and Steel Production (SIC 3312)
7. Soda Ash Use (SIC 284, 2819, 32)

Only direct GHG emissions should be reported. GHG emissions from any indirect sources such as vehicle transportation, offsite waste disposal, or electricity consumption should not be reported. SF₆ emissions from electric power transmission and distribution are not required to be reported.

HOW?

Facilities may download the instructions and spreadsheets from

<http://www.iowadnr.gov/air/prof/ghg/ghg.html>. **Note: the spreadsheets will be posted online no later than January 2, 2009.**

After completion, the spreadsheet can be submitted either one of two ways:

- Electronically (SPARS Web) - Attach electronically to Form 1.0 of your Title V inventory
- Hard Copy - Print out and attach to your Title V inventory

HELP!

For assistance, please contact:

Marnie Stein

marnie.stein@dnr.iowa.gov

515-281-8468

**Air Quality Bureau SPARS Training February 3rd through 5th, 2009 in conjunction with
Title V Workshop (February 3rd and 5th)**

The Air Quality Bureau will be hosting several Training Sessions for clients wishing to use the SPARS Web access for submitting their year 2008 Title V Annual Emissions Inventory.

The Title V section of the Air Quality Bureau will be holding two sessions of a training workshop on the Title V permitting process. These will be half day sessions and run concurrent with SPARS training session. There will be one morning Title V workshop and one in the afternoon. This should allow folks to attend day long combination training in both SPARS as well as Title V application and compliance subject matter. Topics of discussion will cover changes to the application forms, emissions calculations, periodic monitoring, CAM plans and a summary of common application deficiencies. The compliance section will also review the semi-annual and annual Title V reporting forms and common errors found in the submittals. Question and answer sessions will be held during the presentations.

The location will be the Air Quality Bureau's office at 7900 Hickman Rd., Suite 1, Urbandale, IA. Please contact Barb Stock at 515-242-5100 / barb.stock@dnr.iowa.gov to make your reservations.

Sessions will be held in the morning from 8:30 am to no later than noon and 1:00 pm to no later than 4:30 pm.

SPARS Training Sessions

Introductory SPARS Training February 3, 2009 one am and one pm session

Introductory SPARS Training February 4, 2009 one am session

Refresher SPARS Training February 4, 2009 one pm session

Refresher SPARS Training February 5, 2009 one am and one pm session

Title V Workshop Sessions

Title V Workshop Training February 3, 2009 one pm session

Title V Workshop Training February 5, 2009 one am session

Further details will be on our website soon (www.iowacleanair.com) as well as a list serve posting.